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UNITED STATES DISTRICT COURT
DISTRICT OF OREGON
MEDFORD DIVISION

**GREATER HELLS CANYON COUNCIL,
OREGON WILD, CENTRAL OREGON
LANDWATCH, SIERRA CLUB, GREAT
OLD BROADS FOR WILDERNESS, and
WILDEARTH GUARDIANS,**

Plaintiffs,

v.

HOMER WILKES, in his official capacity as
Undersecretary for Natural Resources and
Environment; **GLENN CASAMASSA**, in his
capacity as Regional Forester for Region 6; and
the **UNITED STATES FOREST SERVICE**,

Defendants,

**AMERICAN FOREST
RESOURCE COUNCIL**, and
**EASTERN OREGON COUNTIES
ASSOCIATION**,

Defendants-Intervenors.

Case No. 2:22-cv-00859-HL

**DECLARATION OF
JAMIE DAWSON**

I, Jamie Dawson, state and declare as follows:

1. I am over the age of 18 years, and I make this declaration based on my own personal knowledge. If called to testify, I would testify as follows.

2. I am a resident of Wallowa County, Oregon. I received a Bachelor of Science degree in Environmental Management and Protection from Humboldt State University, which included coursework in dendrology, forest ecology, botany, soil science, and rangeland resource management. From 2012 to 2016, I worked for several public land management agencies, including the Bureau of Land Management and the National Park Service, primarily as a Biological Technician and Park Ranger. During that time, I also worked for the Central Alaska Inventory & Monitoring Network, an intra-agency program of the National Park Service, doing migratory bird surveys.

3. I am currently employed by the Greater Hells Canyon Council, a 501(c)(3) nonprofit organization, as their Conservation Director. Our organization's mission is to connect, protect, and restore the wild lands, waters, native species and habitats of the Greater Hells Canyon Region, ensuring a legacy of healthy ecosystems for future generations. We do this on behalf of our 2,000 members and supporters, who greatly value the mature forests and wild landscapes of Northeast Oregon.

4. From 2017 to 2022, I was employed by Oregon Wild, a 501(c)(3) nonprofit organization, as their Public Lands Campaigner. During that time, I worked with our many members and supporters, and members of the broader public, to protect Oregon's special landscapes for future generations. My duties included engaging the public in various public meetings and comment periods surrounding public lands management and proposed legislation, leading hikes and field trips, and reviewing a variety of proposed management activities. During

my two initial years of this position, I focused almost exclusively on the Ochoco National Forest, and my duties included monitoring proposed timber sales and attending the Ochoco Forest Restoration Collaborative.

5. I am also a member in good standing of the Great Old Broads for Wilderness.

6. Between my former job at Oregon Wild and how I recreate during my personal time, I am fortunate to spend a significant amount of time on the Ochoco National Forest (“the Ochocos”) each year, both inside and outside the Mill Creek Vegetation Management Project area and North Fork Crooked River Forest Resilience Project area (“project areas”). Oregon Wild has been invested in the Ochocos for many decades and has worked on conservation issues on this forest since at least 1983. I value the work that Oregon Wild does to protect and restore Oregon's wildlands, wildlife and waters, and their goal to safeguard fish and wildlife habitat on behalf of their 20,000 members and supporters.

7. Oregon Wild has chosen to invest time and energy in this landscape for many reasons. Its ecological importance cannot be understated; it provides essential habitat for beloved animals such as Rocky Mountain Elk, mule deer, as well as at least 29 other notable species of fish and wildlife as identified by the Oregon Department of Fish & Wildlife’s “Oregon Conservation Strategy”. It also acts as a crucial wildlife migration corridor between the northern Blue Mountains and the Cascades. Additionally, the area is important to Oregon Wild members and supporters around the region and state. I, personally, am honored to have invested so much time working to protect fish and wildlife habitat in the Ochocos because I truly believe this forests’ ecological and social value is increasing exponentially as Central Oregon’s population, and subsequent increase in demand for recreation, grows rapidly and the effects of climate change continue to intensify.

8. I first visited the Mill Creek project area on May 31, 2019, with an Oregon Wild member who was interested in visiting the area but was hesitant to go alone. We looked for birds and wildlife, enjoyed Steins Pillar and hiked from the Wildcat Campground into the Mill Creek Wilderness Area. I was in awe of the unique volcanic geology and diversity of forest in the area. Because of the historic logging and fires in the area, large and old trees can at times feel few and far between in Mill Creek—making it all the more special when you find one.



Close up of furrowed bark on an old growth Ponderosa Pine near Mill Creek, May 2019.

9. On July 7, 2021, I spent time with a local group that I am a member of—the Bitterbrush Broadband of Great Old Broads for Wilderness—surveying the road system in the project area. We systematically checked spur roads off the main 33 Road to catalogue whether they were open or closed, regardless of their official Forest Service “status”. As I have seen in other parts of the Ochocos, a surprising number of roads listed as “closed” by the Forest Service are in fact open and being used regularly by the public. Since I am usually drawn to trails and Wilderness areas, this volunteer project with the Broads gave me the opportunity to see another

part of Mill Creek that I wouldn't usually explore. I was surprised to find a complex and interesting forest along the road system, including a number of large and old (21" in diameter, and larger) trees of various species. This allowed me to see a diversity of bird species including brown creepers and pileated woodpeckers, which are usually associated with more mature forests.

10. I first visited the North Fork Crooked River Forest Resilience Project area on October 29, 2019, on a scenic-driving day trip to explore the forests and roads in the area. I returned in April and May of 2020 and spent substantial time camping, gravel biking, scouting, and hunting turkeys.



Elk walking along the North Fork Crooked River, December 2019

11. I have since visited both project areas periodically to scout and hunt for turkeys, hike with my dog, and trail run with friends and family. I also enjoy bird watching and looking for wildlife in the project area. Large trees are often at the center of all of these activities: birds love them, turkeys roost in them, and they provide much needed shade during hot and dry summer adventures on the trails.

12. I do my best to turkey hunt each spring season, when the flowers (and mosquitoes) are out, and the toms are gobbling from high up in their roost trees and deep in creek gullies. I plan to return to the project areas in Spring 2023 to turkey hunt with friends and family, and later in the year to camp, trail run, and join friends at their hunting camps.

13. Large and old trees are particularly important to me across all of these activities. The Ochocos' large trees have been particularly instrumental for me as I better learn to turkey hunt because, in my experience, they seem to love them for roosting! I have spent countless hours scouring the forest floor below big trees searching for droppings—a less “glamorous” side of hunting. These large trees (living and dead) also attract many of my favorite non-game birds to watch. Owls, tanagers, nuthatches, and raptors all love them as places to forage and survey their surroundings. Large and old trees over 21” play an ecologically crucial and societally important role. In addition to their ecological values, like providing habitat and storing carbon, they provide a certain irreplicable character to the forest. If they are removed, I will choose not to visit the project area and will spend my time elsewhere.



Turkey hunting near Roba Creek, April 2020. In places where huge old-growth trees are scarce, large and mature trees (like those protected by the 21" screens) can act as a temporary stand-in for certain wildlife species.

14. Central Oregon's forests have been heavily manipulated, and the Ochoco National Forest is no exception. I often hear the phrase "pumpkin plucked" to describe them: like children tirelessly searching for the biggest and best jack-o-lantern in the patch, the timber industry has a long history of selectively logging the biggest and best trees across the landscape. That has resulted in a landscape that is largely deficient of large and old trees, and their dead counterparts called snags. In Oregon, only a small percentage of our old growth forests remain, which I

suppose isn't a surprise considering that many people wrongly considered mature forests to be ecological "dead zones" until just a few decades ago.

15. I believe that, in many places, whatever big trees remain are likely only there because of the Eastside Screens, a rule put in place during the old growth logging heyday to protect large and old trees for wildlife habitat. But much like the Clean Water Act or other environmental rules designed to save us from ourselves, the Screens were often disparaged by members and supporters of the timber industry. Certain Oregon politicians were motivated to repeal or heavily amend them from day one, and they finally got their wish through a very rushed and insufficient public process near the end of Donald Trump's presidency.

16. This led to a significant change to the Mill Creek Dry Forest Restoration Project. In an Ochoco Forest Restoration Collaborative meeting in November of 2020, representatives from the Forest stated that they were not intending to remove any trees over 21" in diameter as a part of the project. The project was introduced to the public during scoping with not removing trees over 21" as a settled matter. However, by July of 2021, that had changed. The project now proposes multiple alternatives with commercial timber harvest of large and old trees. Actions like this further deteriorate whatever limited remaining trust the public had in the Forest Service, which in my opinion is currently at an all-time low.

17. For this and many other reasons, my personal interests and those of Greater Hells Canyon Council and our members and supporters, will be irreparably harmed if the Ochoco National Forest and the Forest Service proceeds with logging projects like this one utilizing the amended Eastside Screens.

18. My interests and those of Greater Hells Canyon Council will be served by the Forest Service vacating its decision to amend the Eastside Screens and halting any planning

processes currently using the amended rule. At a minimum, the Forest Service should conduct a robust NEPA analysis of any amendment to the Screens that ensures the public has a more complete opportunity to participate. This analysis should include information on harms resulting from removing trees over 21” in diameter, as well as the benefits of retaining them across the landscape in various stages (alive and dead). In recent decades, the scientific community has found that large and old trees and the forests that contain them are far from ecological “dead zones”—in fact, they are rich in biodiversity across the plant and animal kingdoms. The old saying goes that when you know better, you do better. And now, we know better, so it’s time for the Forest Service to act accordingly.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge. Executed this 16th day of December 2022, in Joseph, Oregon.

A handwritten signature in black ink that reads "Jamie Dawson". The signature is written in a cursive, flowing style. The name "Jamie" is written in a smaller, more compact script, while "Dawson" is written in a larger, more expansive script with a long, sweeping tail on the final letter.

Jamie Dawson